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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 12-384

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 846)

TARA TULLY,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT C. LYNCH, being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between February 2011 and March 2012, within the Eastern District of New York and elsewhere, the defendant TARA TULLY, together with others, did knowingly and intentionally conspire to distribute a controlled substance, which offense involved a substance containing oxycodone, a Schedule II controlled substance.

(Title 21, United States Code, Sections 846 and 841(a)(1)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I have been a Task Force Officer with the DEA for

^{1/} Because the purpose of this affidavit is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

approximately two years and have been a New York State Trooper for eighteen years. My information in this case comes from interviews, conversations with witnesses and other law enforcement officers, and my own participation in this investigation.

2. The DEA Task Force to which I am assigned is currently investigating the illegal distribution of pills and tablets containing oxycodone, a Schedule II controlled substance. "Oxycodone" is the generic name for an opioid analgesic medication synthesized from opium-derived thebaine. "Roxicodone" is a generic oxycodone product designed to have an immediate release effect for rapid pain relief. Oxycodone has a serious potential for abuse. Drug abusers crush the protective coating on the pill and, snort, ingest or inject it, thereby obtaining all of the drugs potency at one time. Oxycodone used in this fashion produces a heroin-like euphoria. Oxycodone is a highly addictive drug.

3. In June 2011, an individual hereinafter referred to as a cooperating witness (CW #1) was arrested in Binghamton, New York in possession of a forged prescription for Roxicodone. Law Enforcement contacted the physician named on the prescription and the physician confirmed that the prescription was forged. CW #1 later agreed to speak with Law Enforcement agents. CW #1 advised that CRAIG CHILLEMI hired CW #1 to pass forged oxycodone prescriptions in exchange for cash and/or pills and that CHILLEMI thereafter distributed the pills. CW #1 advised that, at an apartment in Queens, New York, CHILLEMI was in possession of stolen prescription paper and computer software to print counterfeit

prescriptions. CW #1 stated that in early 2011, at the apartment, CHILLEMI and the defendant TARA TULLY printed out counterfeit prescriptions, paid individuals to pass the prescriptions at pharmacies and distributed the pills as far away from New York City as possible. CW #1 stated that CHILLEMI collected over 1,000 oxycodone pills a day from various sources using the counterfeit prescriptions which pills CHILLEMI thereafter sold to other drug dealers. CW #1 further stated that CHILLEMI ran this operation with the defendant TARA TULLY. CW #1 described defendant TULLY as recruiting individuals to pass the forged prescriptions at various pharmacies and passing forged prescriptions herself.

4. In March 2012, I obtained two forged prescriptions for oxycodone from two different pharmacies in the name of Tara Tully, which she filled. The prescriptions were dated and filled in or about April and May 2011. I have confirmed that they are forged.

5. I believe CW #1 to be reliable as I have been able to independently corroborate his/her information.

WHEREFORE, your deponent respectfully requests that the defendant TARA TULLY be dealt with according to law.


ROBERT C. LYNCH
Task Force Officer - DEA

Sworn to before me this
17th day of April, 2012


THE HONORABLE ARLENE R. LINDSAY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK